

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 4/2/2020

2. Deadline for first request for production of documents and first request for interrogatories: 4/16/2020

2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) ____ ; defendant(s) ____

3. Date for completion of any joinder of additional parties and amendment of the pleadings: 6/1/2020

3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 0-3 ; defendant(s) ____

4. Number of depositions by plaintiff(s) of: parties 10 ; non-parties 10

5. Number of depositions by defendant(s) of: parties 1 ; non-parties 9

6. Date of status conference (joint status report due two business days in advance): _____

7. Date for completion of factual discovery: 11/2/2020

8. Are expert witnesses needed? Yes No ____

8(a). Number of expert witnesses, if any, of plaintiff(s): medical 1 ; non-medical 3

8(b). Date for completion of those expert reports: 1/4/2021

8(c). Number of expert witnesses, if any, of defendant(s): medical 1 ; non-medical 3

8(d). Date for completion of those expert reports: 3/4/2021

9. Date for completion of expert discovery: 4/5/2021

10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): _____

11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Partial MSJ
5/5/2021

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

MSJ
5/5/2021

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes No

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No

[Pursuant to § II(D) of the Court's order dated February 9, 2020 (DE #46), plaintiff respectfully encloses the transcript of the March 10, 2020 pre-motion conference for the Court's reference as pertinent to the initial conference.]

Defendants conferred with Plaintiff on this questionnaire on 3/31/2020 before Plaintiff supplied them with an amended complaint. They reserve the right to amend their answers to the questionnaire after seeing the amended complaint.